

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

Cornelius Stephens
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Pennsville, NJ 08070
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In Re:
Cornelius Stephens dba Merimades LLC dba
Choice Employment Services LLC

Debtor

AMENDED

2023 DEC 27 P 3:09

BY: KR

Case No: 20-14850 ABA

Chapter: 13

Judge: Andrew B. Altenburg, Jr.

**CERTIFICATION IN OPPOSITION TO TRUSTEE'S
CERTIFICATION OF DEFAULT**

1. I, Cornelius Stephens, am the Debtor in the above case and I am representing myself.
2. I have accessed and reviewed the business filing with respect to creditor Madison CDF LLC, in relation to the New Jersey Department of State, New Jersey Department of Banking, and the New Jersey Real Estate Commission.
3. Permit me to begin by stating, a search revealed that as of the date debtor and, Castlerock 2017, LLC ("former creditor") entered Installment Land Contract, August 13, 2018, former creditor, although being registered with the New Jersey Department of State, former creditor was not registered with, nor licensed by, the New Jersey Department of Banking nor the New Jersey Real Estate Commission. **(Exhibit-A)**.

4. Moreover, former creditor was not licensed under the Nationwide Multistate Licensing System (“NMLS”). The NMLS license would have authorized former creditor, being a New York or foreign corporation to service mortgages within the state of New Jersey. former creditor held itself out as being a legitimately real estate corporation licensed by the MNLS to service debtor’s mortgage.

5. As a prerequisite the New Jersey Real Estate Commission, requires any company which engages in the purchase or sale of real property in New Jersey to first be both registered and licensed before doing business within the state. Doing business extends to defending against a claim or lawsuit or seeking to enforce a claim or file lawsuit as here. Absent the proper license, former creditor was without standing to pursue enforcement of its claim in bankruptcy court.

6. Former creditor, after entering Installment Land Contract with debtor, quitclaimed property to Castle CDF Group LLC., and Castle CDF Group LLC., subsequently quitclaimed property to the creditor currently holding claim, Madison CDF LLC.

7. Nonetheless, it should be noted that neither Castle CDF Group LLC nor Madison CDF LLC were registered nor licensed with, or by, the New Jersey Department of State, New Jersey New Jersey Department of Banking nor the New Jersey Real Estate Commission to do business within New Jersey. Moreover, Castlerock 2017, LLC., neither Castle CDF Group LLC nor Madison CDF are not licensed under the NMLS to service debtor’s mortgage within New Jersey.

8. Castlerock 2017, LLC’s conduct stands in violation of the chain of title and such violation is imputed to Castle CDF Group LLC and Madison CDF LLC, and thereby eliminating any standing Madison CDF LLC would have to enforce a claim against creditor in these bankruptcy proceedings.

Based on the foregoing, I respectfully ask this court to issue an order canceling any further payments to creditor Madison CDF LLC., who holds priority secured creditor status. I further request this court direct the Trustee to make all future payments to the remaining creditors, and that all future payments to be calculated at an amount which would allow creditor to satisfy plan within the remaining months of debtor's plan.

Dated: December 23, 2023
Pennsville, New Jersey


Cornelius Stephens, Debtor

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Andrew B. Finberg Chapter 13 Standing Trustee Office of the Trustee 535 Route 38, Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>E-Mail</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)